

OLSHAN

PARK AVENUE TOWER • 65 EAST 55TH STREET • NEW YORK, NEW YORK 10022
TELEPHONE: 212.451.9300 • FACSIMILE: 212.451.9999

EMAIL: TFLEMING@OLSHANLAW.COM
DIRECT DIAL: 212.451.2213

November 18, 2015

VIA ECF AND MAIL

Honorable William H. Pauley III
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 1920
New York, NY 10007

Re: *Gemini Master Fund, Ltd. and Black Mountain Equities, Inc. v.*
Electronic Cigarettes International Group, Ltd., 15-cv-3378 (WHP)

Dear Judge Pauley:

We represent plaintiffs Gemini Master Fund, Ltd. and Black Mountain Equities, Inc. ("Plaintiffs"). We write, with the consent of defendant's counsel, to request an extension of the deadline for the completion of discovery. Pursuant to this Court's Scheduling Order dated July 24, 2015 [Doc. 13], all parties are required to complete discovery by November 30, 2015. To date, all parties have produced documents, and defendant has deposed Plaintiffs. Plaintiffs must still complete the deposition of defendant by its Chief Financial Officer, Phil Anderson.

Plaintiffs request to extend the discovery deadline cutoff to December 31, 2015 to facilitate the scheduling of this deposition. The pre-trial dates set forth in the Scheduling Order would remain the same. Plaintiffs have not previously requested additional time to complete discovery. Thank you for your consideration.

Respectfully submitted,



Thomas J. Fleming, Esq.

cc: Lawrence S. Hirsh, Esq.